

# **EXHIBIT 2**

**FILED UNDER SEAL**

**SHOOK**  
HARDY & BACON

January 10, 2025

Veronica Gromada

**BY ELECTRONIC MAIL**

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***Co-Lead Counsel for Plaintiffs***

***Re: In re: Uber Technologies, Inc., Passenger Sexual Assault Litigation,  
Policy and Knowledge Base Production***

Dear Counsel:

On behalf of our clients, Uber Technologies, Inc., Rasier, LLC, and Rasier-CA, LLC (collectively, “Defendants”), we are producing documents pursuant to the Court's December 19 Order (ECF 1996). Defendants have collected the 40 documents requested by Plaintiffs on December 20 and 23, 2024, which include policies, Knowledge Bases (“operational guides”), and other documents identified by Plaintiffs as “of particular importance to the case,” including embedded links. These documents have been marked with Bates numbers UBER\_JCCP\_MDL\_002266918 to UBER\_JCCP\_MDL\_002274195. This production includes some hand-delivered documents, in order to provide Plaintiffs a complete production today; a supplemental overlay production will be made of those documents. Please note that documents in this production have been labeled as “CONFIDENTIAL” consistent with the JCCP Protective Order

entered by the Court on September 14, 2022 and the MDL Protective Order entered by the Court on December 28, 2023. The designated materials shall be handled and stored in accordance with these Orders of the Court.

Per the agreement of the parties in the JCCP and MDL, Defendants are making a single production in both actions, with the Bates prefix of UBER\_JCCP\_MDL. [REDACTED]

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As discussed during our **January 9, 2025** conferral, in some instances, the “embedded links” are links to sections contained within a particular document. In other instances, the links correspond to related operational guides. Defendants have searched for and are producing responsive, non-privileged documents to Plaintiffs’ priority requests on **January 10, 2025**. Additional linked documents to other policies and KBs will be produced by **January 31, 2025**.

Production of these materials is not intended to, and does not, waive any applicable privilege or other legal basis under which information may be protected from disclosure. If it were found that provision of this material constitutes production of otherwise privileged matters, such disclosure would be inadvertent, and is not intended to, and does not, waive any attorney-client privilege, work-product, or other protection that the producing party would otherwise be entitled to assert with respect to the inadvertently produced material and its subject matter.

Defendants reserve the right to amend, supplement, correct, or modify the information contained herein and in the associated documents, if and as we obtain additional information.

### **Attorney-Created Index - Timeline of Operative Versions**

This letter also serves as Defendants’ court-ordered attorney letter providing a “timeline describing the operative versions” of policy and KB documents included in this production. Because this information does not exist in the regular and ordinary course of business, Defendants’ outside counsel and in-house counsel created the attached index for compliance with the court order.

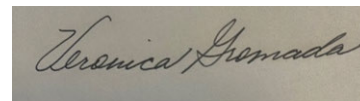
The index complies with the court's order by providing the dates of versions created over time for each document requested by Plaintiffs, with corresponding Bates numbers. As discussed, consistent with the Court's guidance, Defendants have withheld as privileged, and will log, the operative versions of two documents requested by Plaintiffs: "Language Do's and Don'ts for IRT-A/C Privileged and Confidential Attorney Work Product" and "Sensitive Investigations - Legal Resources - Legal Compliance Guide."

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Plaintiffs' document requests comprised the text of links in documents previously produced or reproduced in this litigation. The text provided in links does not always correspond with the titles of the actual documents. Further, policies and Knowledge Bases are subject to change over time. Defendants have undertaken reasonable efforts to identify the documents requested by Plaintiffs with the information provided in the requests and subsequent conferrals, and have provided a list below of the documents corresponding to Plaintiffs' requests.

As previously explained, Defendants do not maintain a general index of these systems in the ordinary course of business. Any such index provided in this litigation, including the timeline provided, was created by counsel pursuant to this litigation consistent with the JCCP Protective Order entered by the Court on September 14, 2022 and the MDL Protective Order entered by the Court on December 28, 2023.

Sincerely,



Veronica H. Gromada  
Partner

cc:

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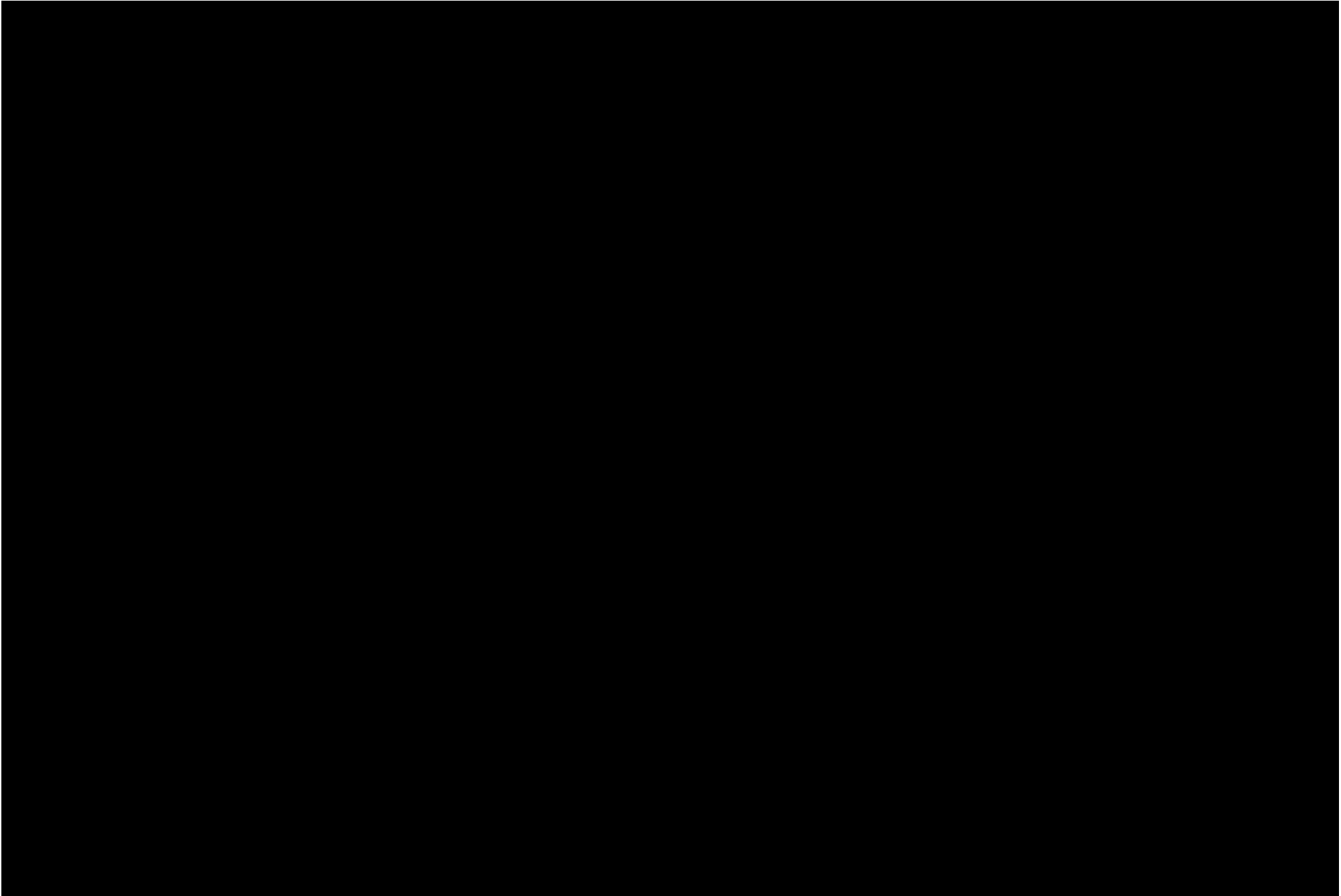
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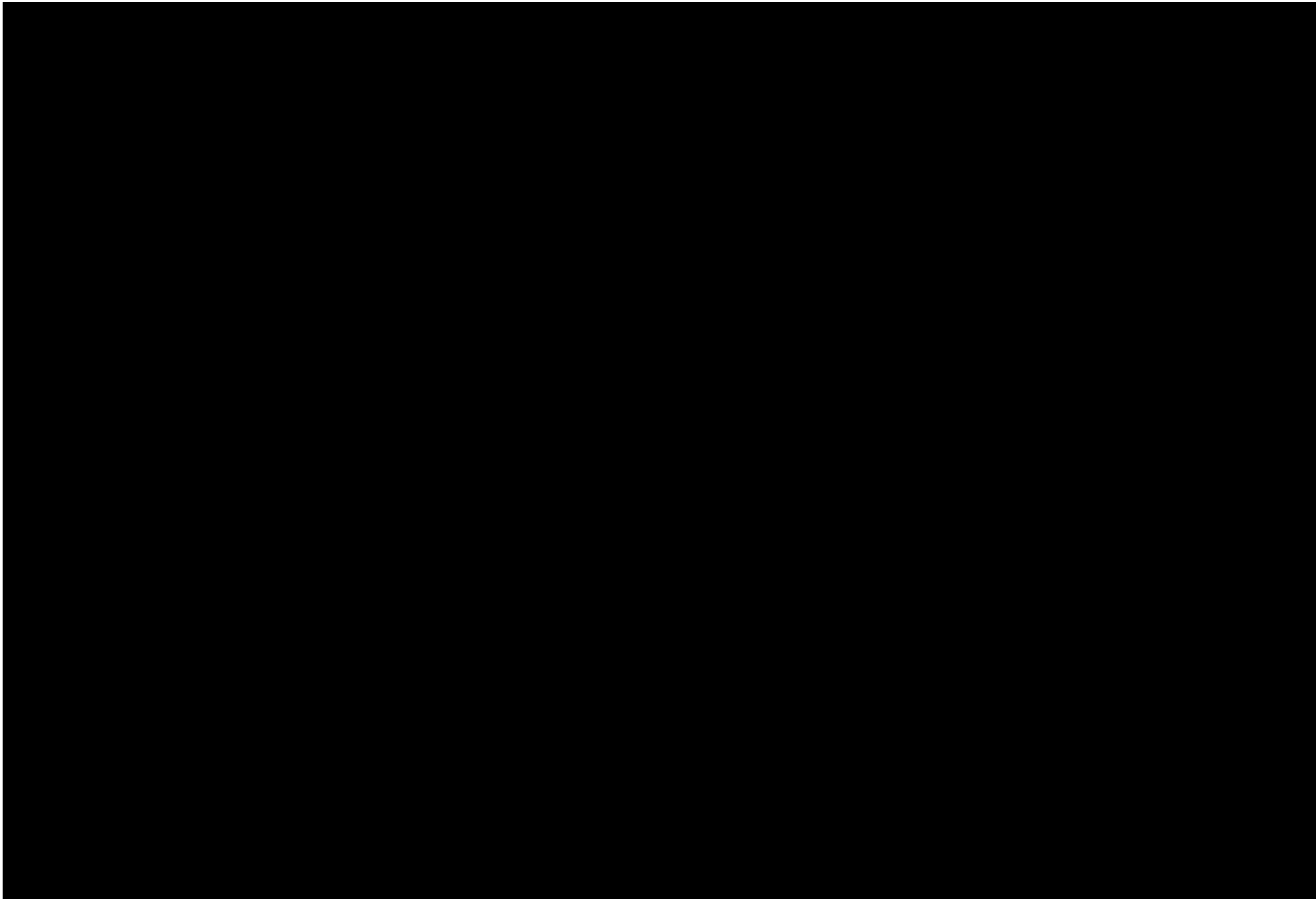
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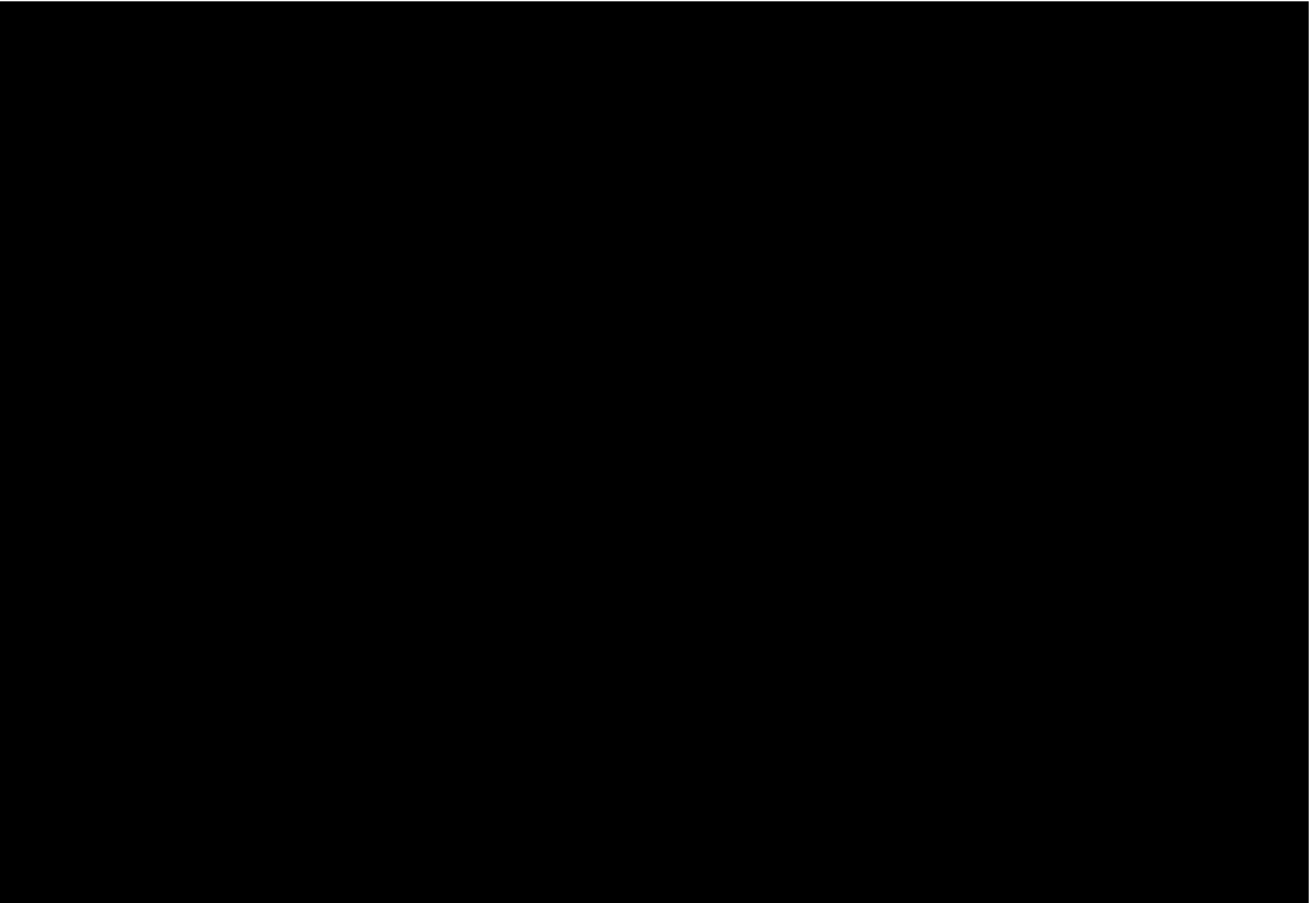




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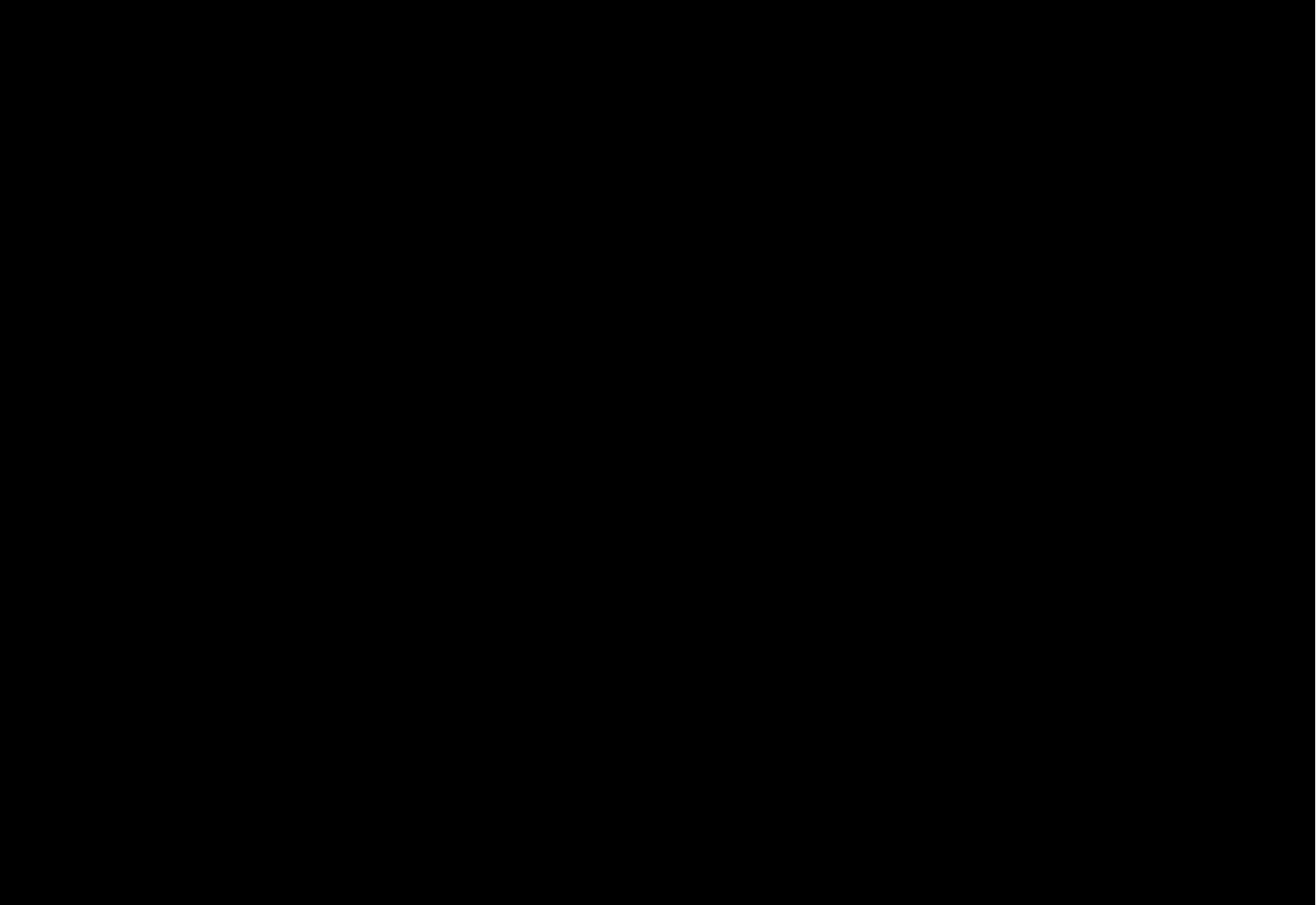
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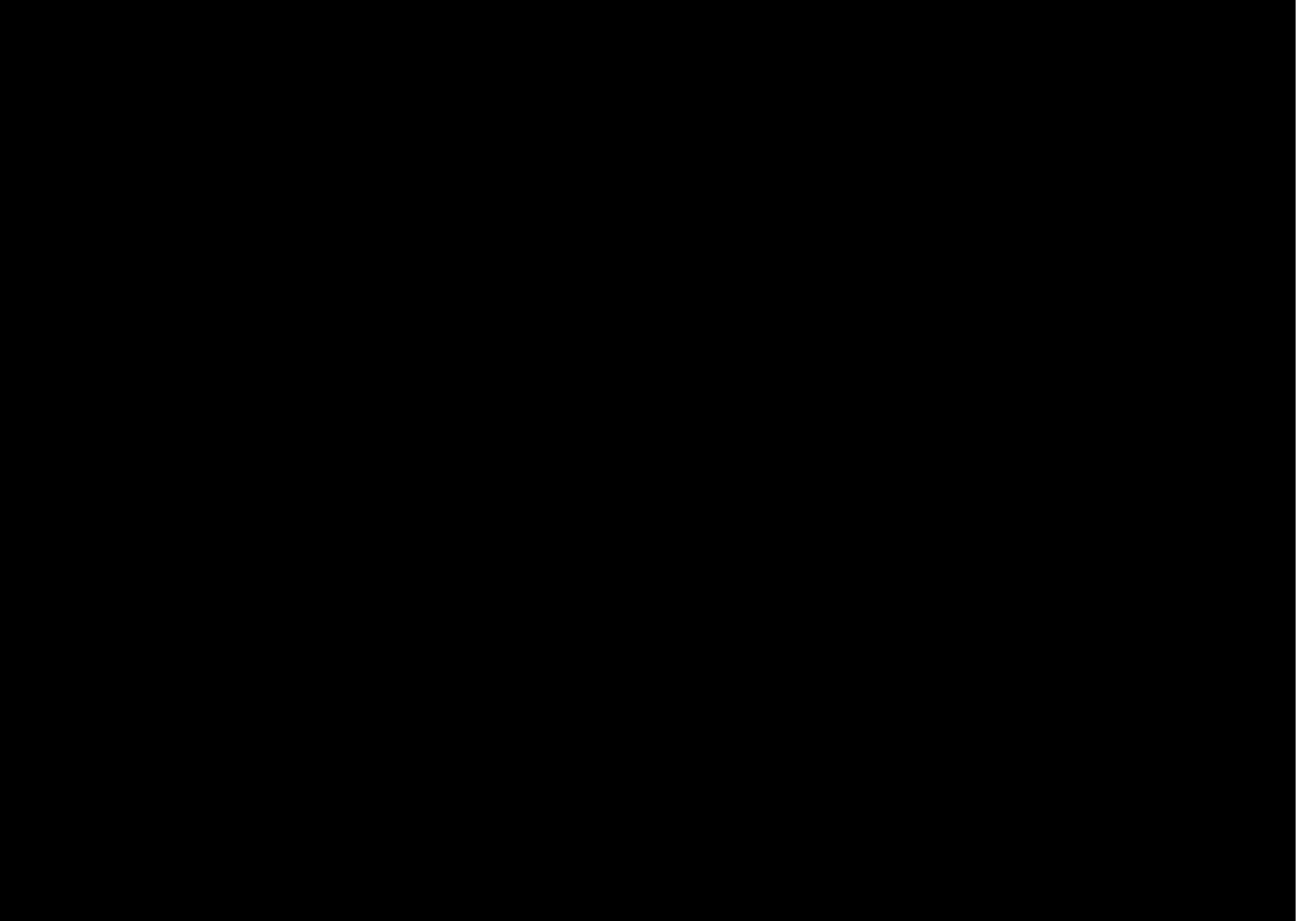
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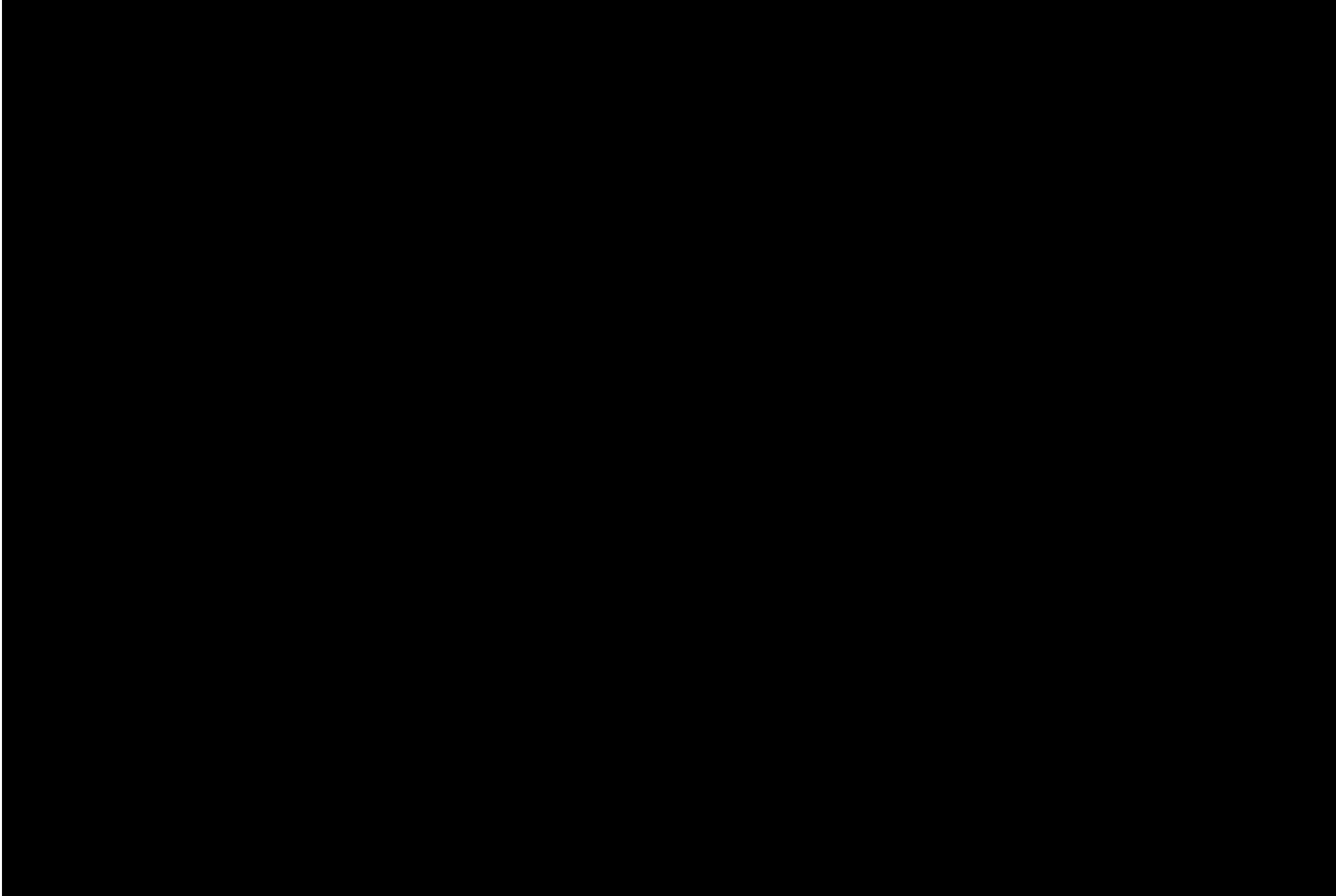
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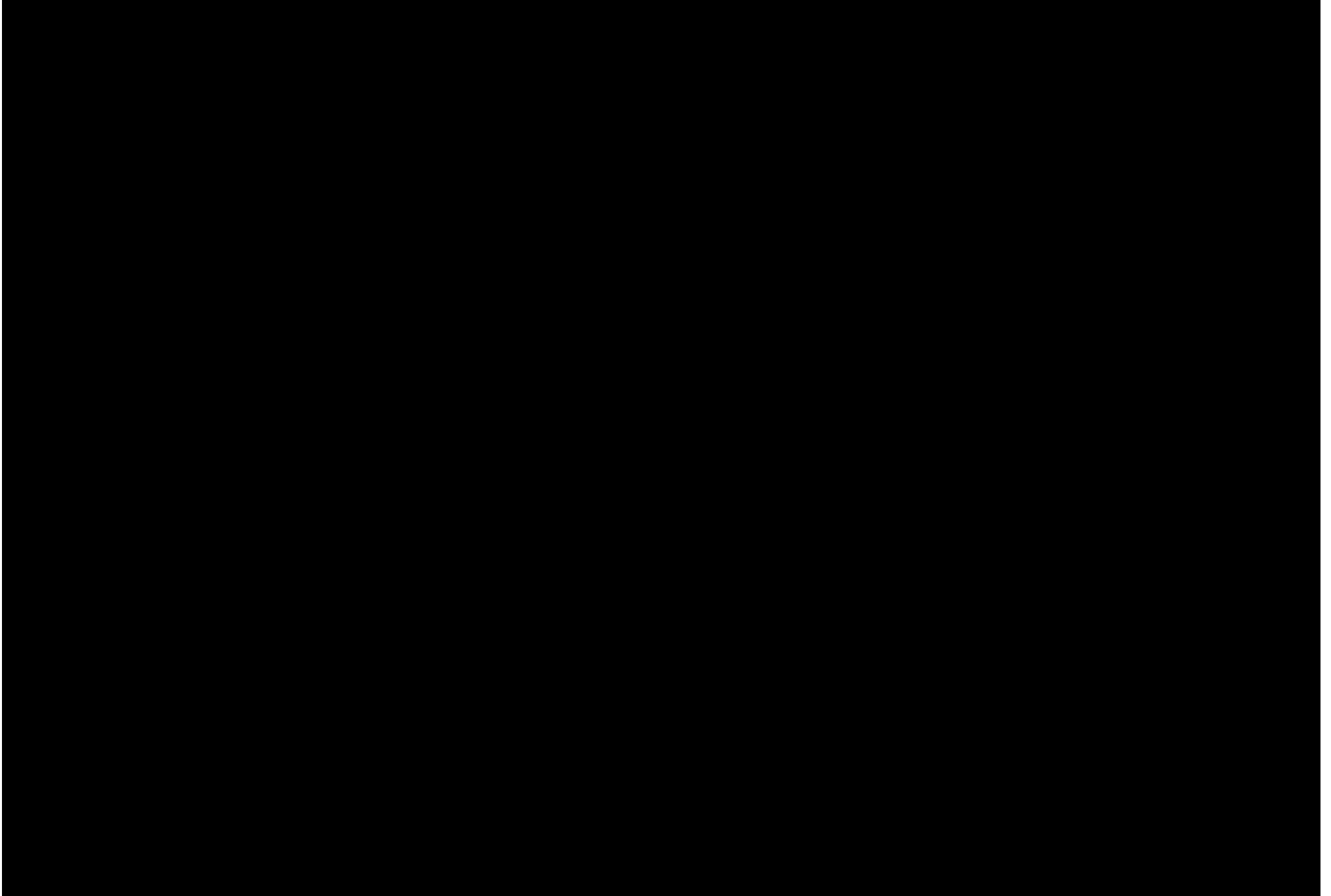


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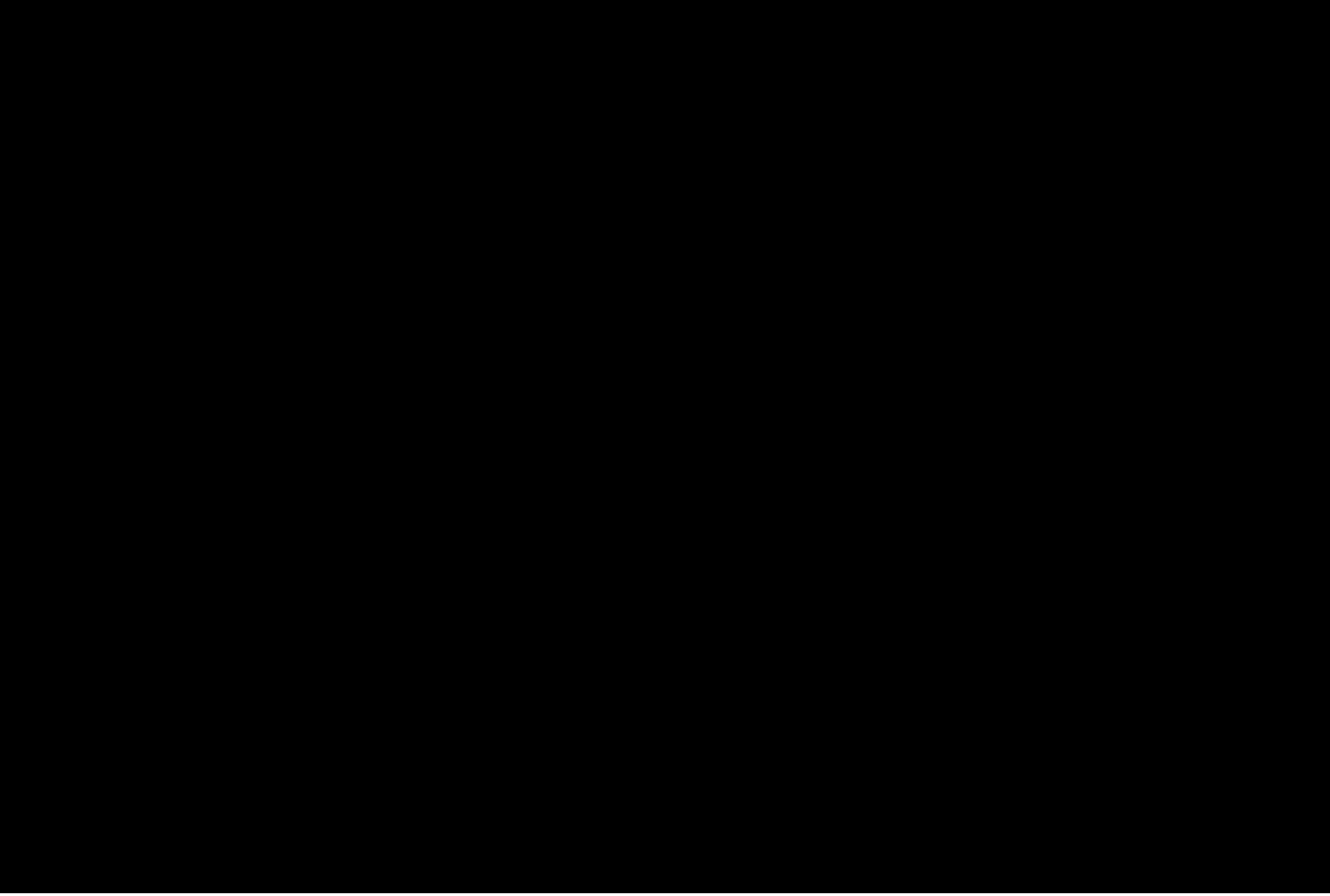


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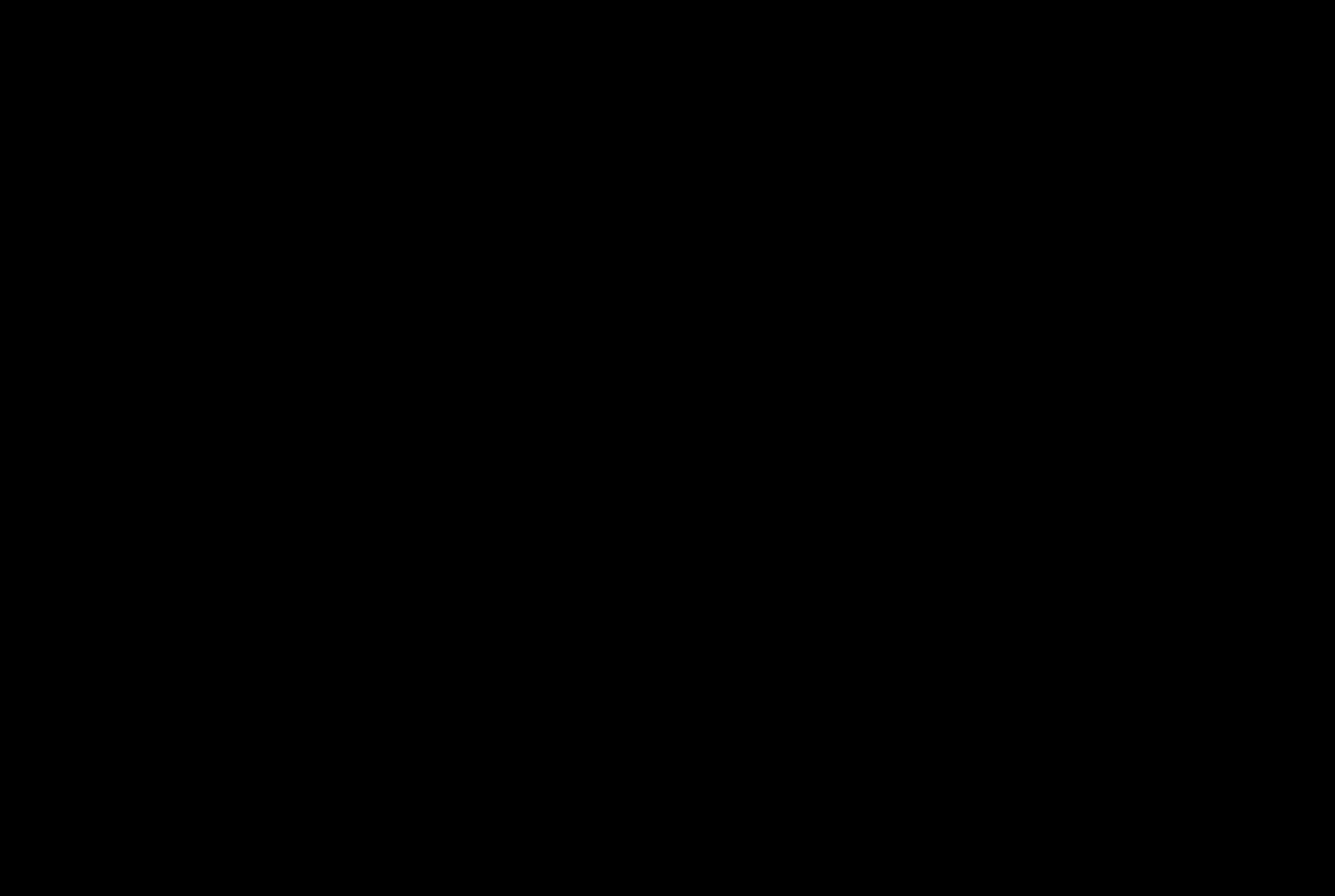


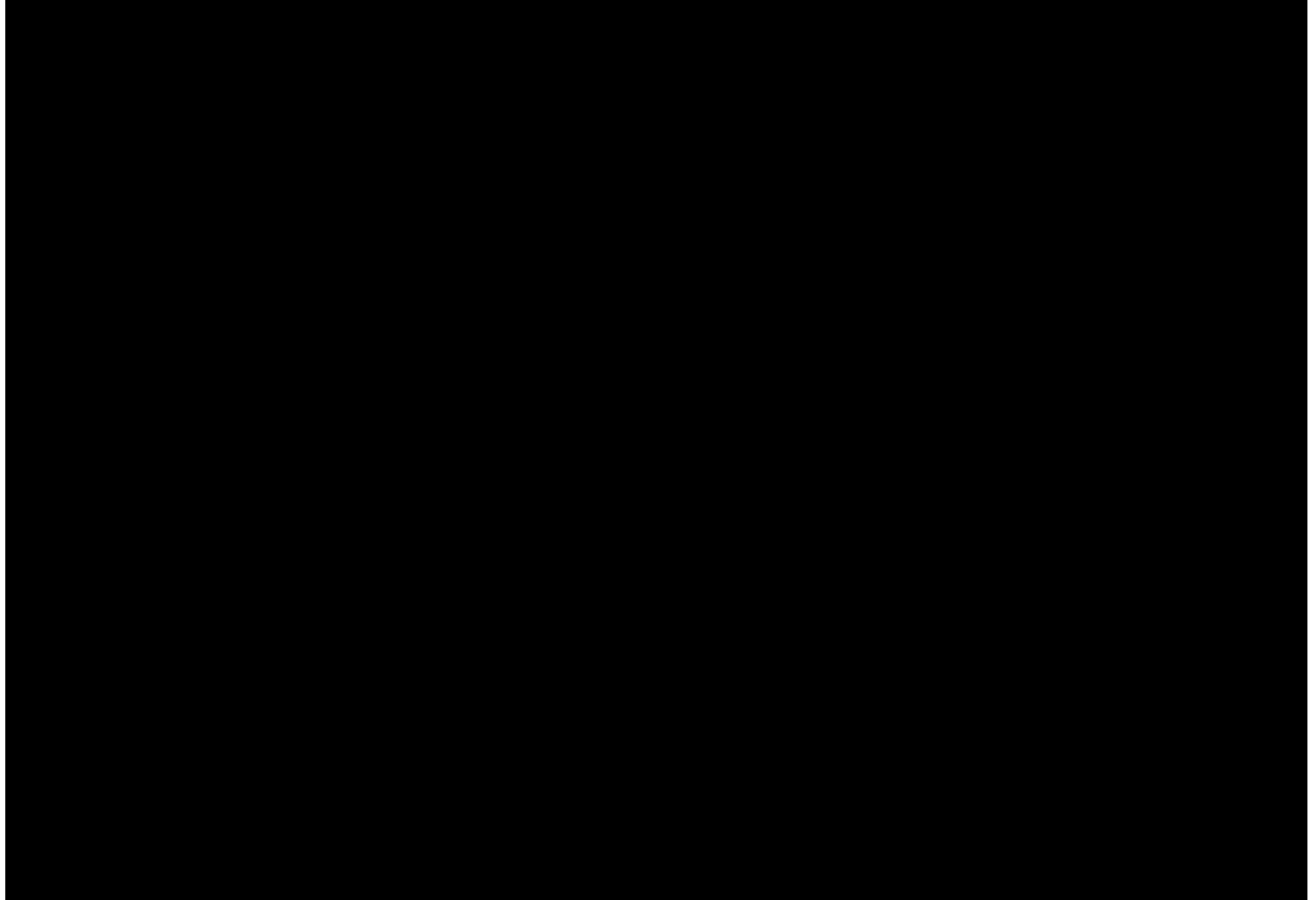
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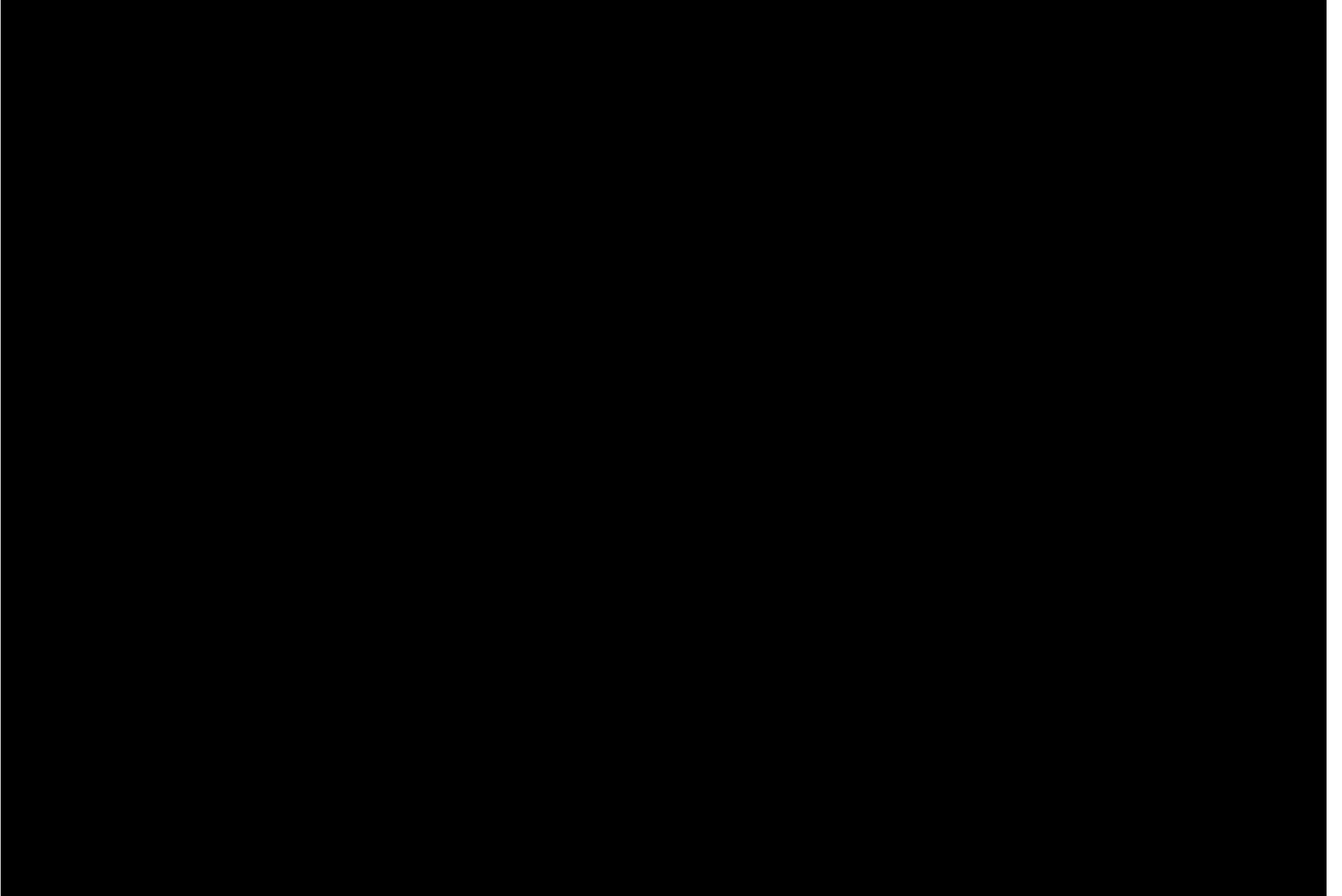


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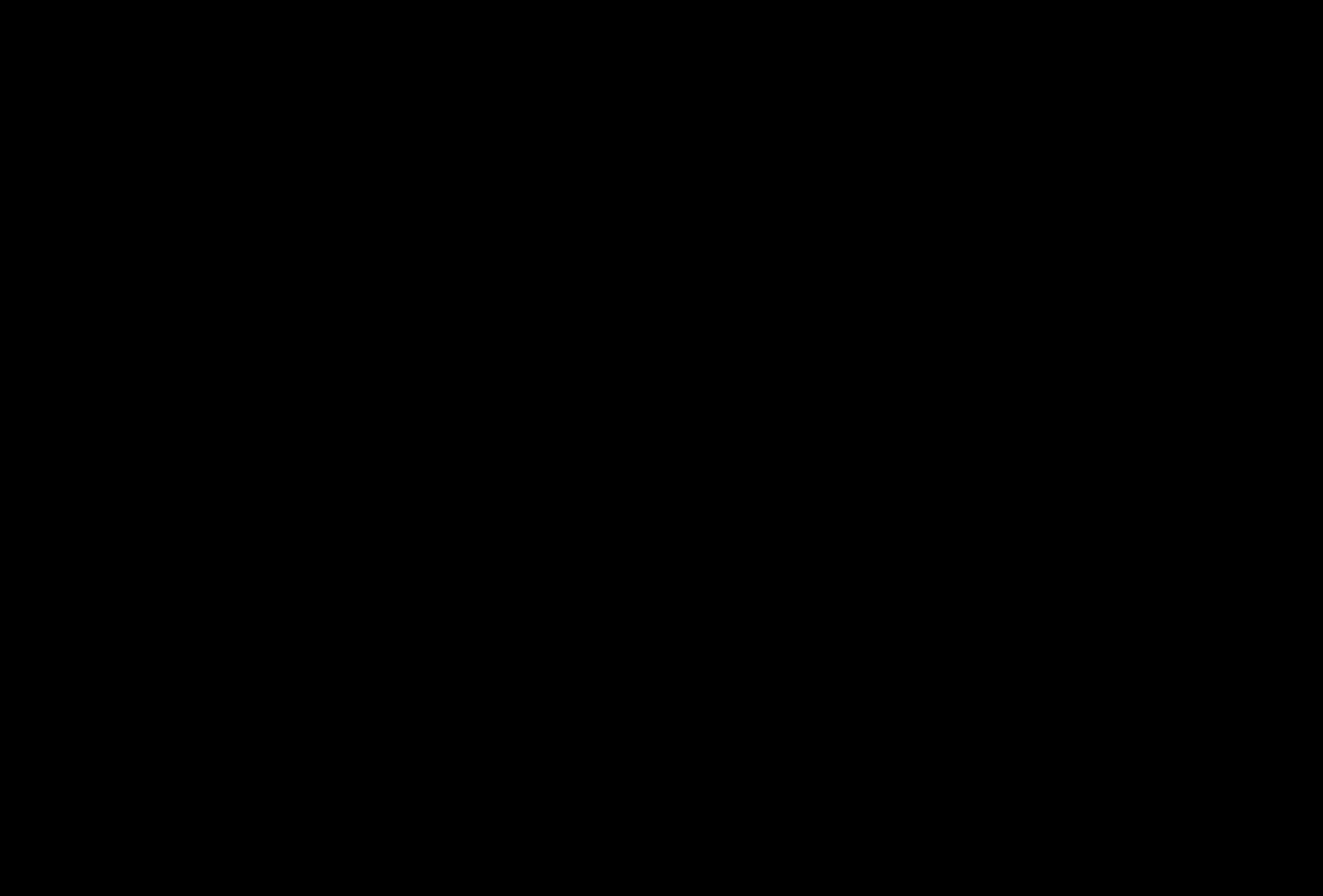




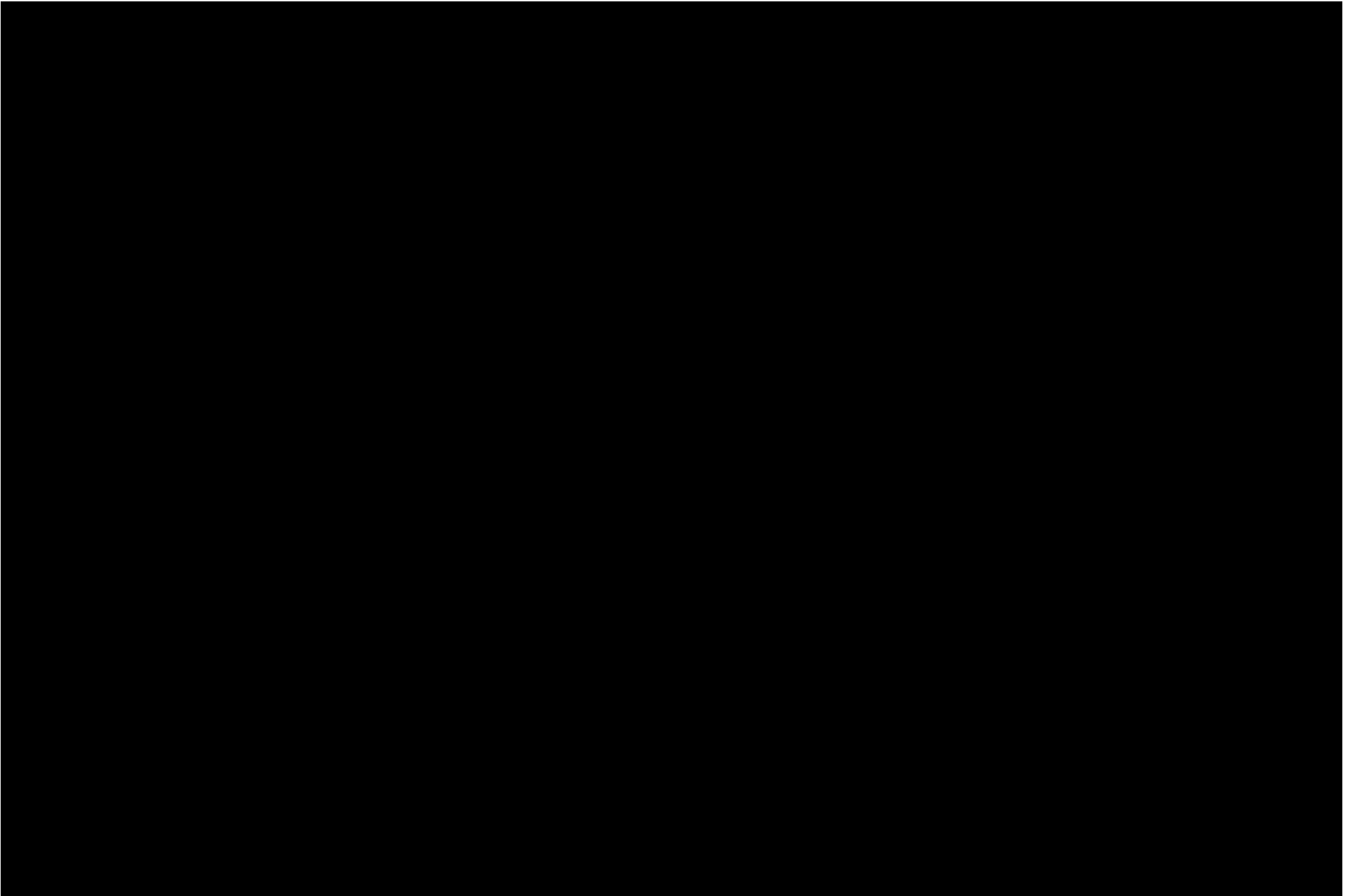
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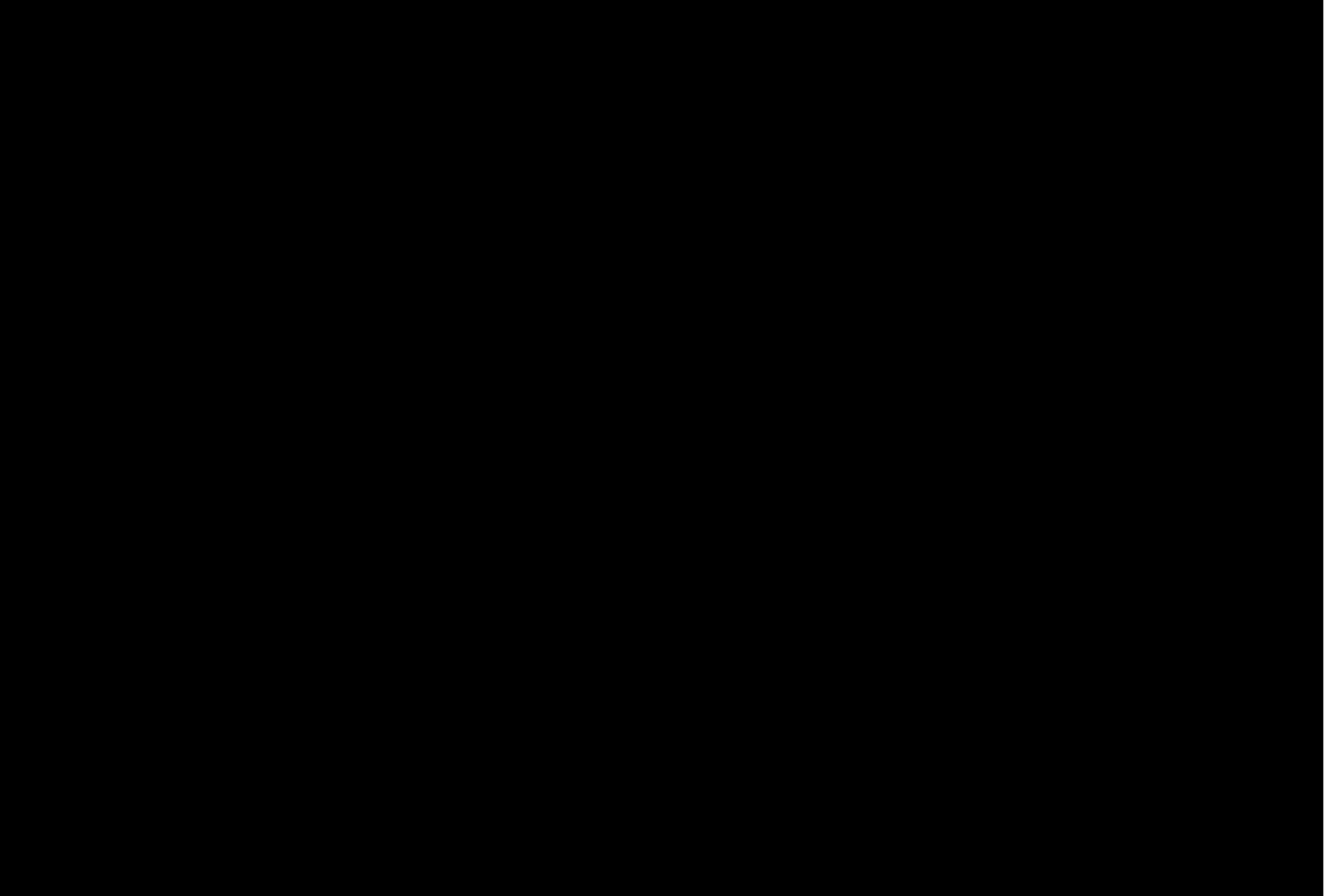
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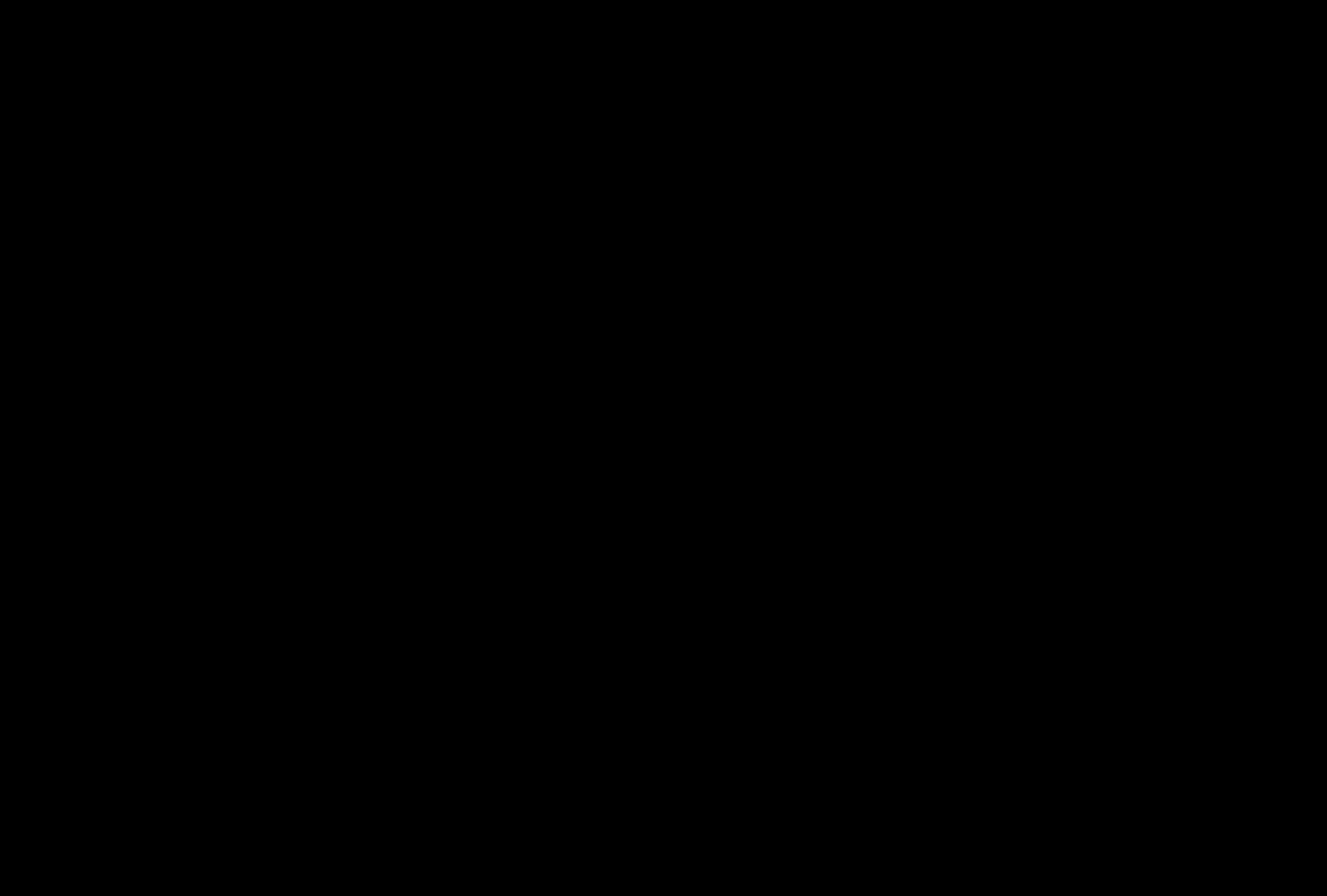


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